


ROBERT WISNIEWSKI P.C.
ATTORNEYS-AT-LAW

17 STATE STREET, SUITE 820 • NEW YORK, NY 10004
TEL: (212) 267-2101 • WEB: www.rwapc.com

December 8, 2022

Hon. Vernon S. Broderick, USDJ
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 12/9/2022

Re: Soto v. Triumph Construction Corp. et al.
Docket No.: 21-cv-02449-VSB

Dear Judge Broderick,

I represent Plaintiff in the above-entitled action. I write on behalf of both parties to request one more extension of time from December 9, 2022 to Thursday, December 15 to file a Cheeks motion. All prior requests were granted for good cause and there is no prejudice to any party.

The parties have resolved all of their textual issues and what remains is the execution of the documents by all parties. These logistical issues have unfortunately taken longer than expected, owing in part to travel by some of the parties. I am confident that this will be a final application for an extension of time.

Wherefore, I respectfully request that Your Honor extend the time for the parties to file the Cheeks motion by Thursday, December 15, 2022

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski

cc: via ECF
All Counsel of Record